Kelly, Shaheerah

From: Shane Young [SWyoung@spi-ind.com]
Sent: Friday, September 27, 2013 3:51 PM

To: Kelly, Shaheerah

Subject: RE: SPI Anderson Project

Shaheerah,

I did some checking and our Authority to Construct states that the use of natural gas in our boiler is limited to 500 hours per year or 5.7%. It also states for startup, shut down and flame stabilization.

A very simple definition of flame stabilization: "To maintain the proper combustion of the fuel being burned".

An example would be typically in the wetter times of the year when we see a good amount of rainfall we may get a slug or pocket of wet fuel in the boiler. When this occurs we see our CO emissions rise, at times above our permit limits. The flame has become unstable. It normally takes anywhere from 1 to 3 hours to purge this fuel and replace it with a drier fuel. The ability to burn natural gas during this period allows us to stay within our permit limits while we rotate our fuel to get the boiler back to normal operation. Another note is we do manage our fuel. We blend and mix different types of fuel to avoid the occurrence of a wet pocket.

Let me know if you need anything else. Have a good weekend.

Best Regards

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From: Kelly, Shaheerah [mailto:Kelly.Shaheerah@epa.gov]

Sent: Friday, September 27, 2013 3:08 PM

To: Shane Young

Subject: SPI Anderson Project

Hi Shane,

Thanks for answering my questions about the facility by phone this afternoon. As a follow up, can you please describe "flame stabilization" as it relates to the proposed biomass boiler.

Best regards,

Shaheerah Kelly U.S. Environmental Protection Agency, Region 9 Permits Office, Air Division San Francisco, CA 94105

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